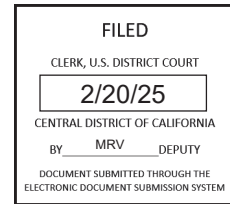


UNDER GOD,

CASE # 2:25-cv-01563-UA



IN THE UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF THE STATE OF CALIFORNIA

T. H, on behalf of minor child R.S. III,

Plaintiff,

v.

PASADENA UNIFIED SCHOOL DISTRICT (PUSD), PASADENA BOARD OF EDUCATION,

STATE OF CALIFORNIA GENERAL SERVICES, and Dr. ELIZABETH BLANCO BRANDI

WOJCIECHOWSKI, ALICIA FLORES, MIRIAN MEEHAN, ADRIANA GARCIA, RAFE

GOODWELL, OWENS ORDONEZ, RYAN FLORES, ANA DEMARCO, ROBERT GALVAN,

AIKATERINI (KATERINA) KALYVIOTI, RENEE CRUZ, JENNIFER HALL LEE, TINA

FREDERICKS, KIMBERLEY KENNE, individually and in their personal capacities,

Defendants.

Case No.: _____

CIVIL COVER SHEET

I. PLAINTIFF

Name: T.H., on behalf of minor child R.S. III

Address: 600 Lincoln Ave., Pasadena, CA 91103

Representation: Sui Juris

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II. DEFENDANTS

Names: PASADENA UNIFIED SCHOOL DISTRICT (PUSD), PASADENA BOARD OF EDUCATION, STATE OF CALIFORNIA GENERAL SERVICES, and Dr. ELIZABETH BLANCO, BRANDI WOJCIECHOWSKI, ALICIA FLORES, MIRIAN MEEHAN, ADRIANA GARCIA, RAFE GOODWELL, OWENS ORDONEZ, RYAN FLORES, ANA DEMARCO, ROBERT GALVAN, AIKATERINI (KATERINA) KALYVIOTI, RENEE CRUZ, JENNIFER HALL LEE, TINA FREDERICKS, KIMBERLEY KENNE, individually and in their personal capacities.

III. BASIS OF JURISDICTION

This Court has jurisdiction under the following provisions:

1. Federal Question Jurisdiction (28 U.S.C. § 1331)

- This case arises under federal law, as it involves violations of the Individuals with Disabilities Education Act (IDEA, 20 U.S.C. § 1400 et seq.), the Americans with Disabilities Act (ADA, 42 U.S.C. § 12101 et seq.), Section 504 of the Rehabilitation Act (29 U.S.C. § 794), and civil rights violations under 42 U.S.C. § 1983.

2. Three-Judge Panel Requirement (28 U.S.C. § 2284)

- This matter requires a three-judge panel as it challenges state-wide policies that violate the fundamental constitutional rights of the Plaintiff and similarly situated individuals. The issues presented involve systemic violations of the

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right to a Free Appropriate Public Education (FAPE) and equal protection
under federal disability laws.

3. Jurisdiction over Public Officials Acting Outside Lawful Authority

- Defendants have acted beyond their lawful capacity by failing to provide legally mandated special education accommodations, requiring this Court to intervene under federal jurisdiction to ensure compliance with federal disability and civil rights protections.

4. Supplemental Jurisdiction (28 U.S.C. § 1367)

- To the extent that any state law claims arise from the same facts as the federal claims, this Court has supplemental jurisdiction over those claims to ensure complete relief for the Plaintiff.

5. Venue (28 U.S.C. § 1391)

- Venue is proper in the Central District of California because the Defendants are located in this district, and the events giving rise to this action occurred within this jurisdiction.

IV. VENUE

Pursuant to 28 U.S.C. § 1391, venue is proper in the Central District of California as the Defendants are located within this district, and the events giving rise to the claims occurred within this jurisdiction.

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V. CAUSE OF ACTION

Statutes Involved: 20 U.S.C. § 1400 (IDEA), 42 U.S.C. § 12101 (ADA), 29 U.S.C. § 794

(Section 504 of the Rehabilitation Act), 42 U.S.C. § 1983 (Civil Rights Violations).

Summary of Case:

Defendants unlawfully removed R.S. III from his Individualized Education Program (IEP) despite his qualifying disability, in violation of federal disability laws. Defendants acted outside their lawful authority, thereby depriving him of his right to a Free Appropriate Public Education (FAPE) under IDEA, ADA, and Section 504 of the Rehabilitation Act.

VI. RELIEF SOUGHT

- Declaratory relief affirming that Defendants' actions violate federal disability laws and constitutional protections.
- Injunctive relief reinstating R.S. III's IEP and mandating compliance with disability accommodations.
- Monetary damages of \$500,000 per day from April 12, 2024, totaling \$157,000,000 as of February 20, 2025, for the deprivation of educational and legal rights.
- Default judgment if Defendants fail to provide proof of their lawful authority within three (3) days of service.

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VIII. CERTIFICATION

I declare under penalty of perjury that the information provided is true and correct to the best of my knowledge.

DATED: 2/20/2025

Respectfully submitted,



T.H

600 Lincoln Ave.

Pasadena, Ca 91103

Sui Juris, Plaintiff